Before the FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of)	
)	
Petition for Declaratory Ruling to the)	WC Docket No. 09-152
Iowa Utilities Board and Contingent)	
Petition for Preemption)	

MOTION OF QWEST COMMUNICATIONS COMPANY, LLC TO SUSPEND COMMENT SCHEDULE

Qwest Communications Company, LLC ("Qwest") hereby requests that the comment schedule in the above-captioned proceeding be suspended until after the Iowa Utilities Board has released its Order in the pending traffic pumping investigation.

In the Petition for Declaratory Ruling filed by Great Lakes Communication Corp. and Superior Telephone Cooperative ("Great Lakes"), Great Lakes requests that this Commission preempt the Iowa Utilities Board from taking action in its docket involving intrastate traffic pumping. By Public Notice of August 20, 2009, 3 the Commission established a comment cycle, with comments due September 21, 2009, and replies on October 6, 2009.

The Iowa Utilities Board's Order has not been released, and the Petition is based entirely on Great Lakes' recollections of the Iowa Utilities Board's public hearing and its characterizations of Qwest's proposed findings of fact and conclusions of law in the Iowa proceeding. Qwest is prepared to analyze the basic preemption principles that should govern any Commission analysis of the Iowa Utilities Board Order once it has been released. Qwest is also

¹ Qwest files this Motion to Suspend Comment Schedule pursuant to Commission rule 47 C.F.R. § 1.41.

² In Re: Qwest Communications Corporation v. Superior Telephone Cooperative, Docket No. FCU-07-2, State of Iowa, Department of Commerce, Iowa Utilities Board.

³ Public Notice, WC Docket No. 09-152, DA 09-1843, rel. Aug. 20, 2009.

prepared to analyze the apparent premise of the Great Lakes Petition -- that all interstate access matters are automatically within the jurisdiction of the Commission. But doing so in the absence of the specific context of the Iowa Utilities Board Order would seem to be a frivolous exercise. Traffic pumping is an extremely important issue, one that deserves serious treatment by both federal and state regulators. Once the Iowa Utilities Board Order has been released, the parties can properly analyze what the Iowa Board did and the Commission can determine how the Iowa Board's actions fit within the dual federal/state scheme of telecommunications regulation.

Accordingly, Qwest requests that the comment cycle in this docket be suspended until after the Iowa Utilities Board has issued its Order in Docket FCU-07-2. Qwest will advise the Commission immediately upon receiving a copy of the Iowa Utilities Board Order when it is released.

Respectfully submitted,

QWEST COMMUNICATIONS COMPANY, LLC

By: /s/ Robert B. McKenna

Craig J. Brown

Robert B. McKenna

Suite 950

607 14th Street, N.W.

Washington, DC 20005

(303) 383-6650

Craig.Brown@qwest.com

Robert.McKenna@gwest.com

Its Attorneys

September 15, 2009

2

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing MOTION OF QWEST COMMUNICATIONS COMPANY, LLC TO SUSPEND COMMENT SCHEDULE to be: 1) filed via ECFS with the Office of the Secretary of the FCC in WC Docket No. 09-152; 2) served via e-mail on Douglas Slotten at douglas.slotten@fcc.gov, and Lynne Hewitt Engledow at lynne.engledow@fcc.gov, of the Wireline Competition Bureau; 3) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at fcc@bcpiweb.com.; and 4) served via First Class United States Mail, postage prepaid on the party listed below.

/s/ Richard Grozier Richard Grozier

September 15, 2009

Ross A. Buntrock
Jonathan E. Canis
Adam D. Bowser
Arent Fox LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036

Counsel for Great Lakes Communication Corp. Superior Telephone Cooperative